

RIGGS, ABNEY, NEAL, TURPEN, ORBISON & LEWIS

A PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW
THE PARAGON BUILDING SUITE 101
5801 BROADWAY EXTENSION
OKLAHOMA CITY, OKLAHOMA 73118-7489
(405) 843-9909
Fax (405) 842-2913

GREGORY W. ALBERTY
REBECCA V. ARMENT
JACK R. ANDERSON
THOMAS M. ASKEW
RYAN J. ASSINK
LISA K. BICKLE
DONALD M. BRIGHAM
WILLIAM A. BOWLES
RICHARD B. BOYLE, IV
KELLY L. BRATCHER
PETER W. BRODLICK
ETACIE BRYZA
SCOTT W. BYRD
MICHELLE M. CARTER
JILL L. CHASE
DERICK D. CORNEJO
STEPHEN L. CORTES
MATTHEW P. CROUCH
ROBERT P. DEAN
GLENN S. DORRIS
JANET S. DUMONT
RALPH EDWARDS, JR.
GEORGE M. EMERSON
STEPHANIE A. FUNG
RICHARD A. GAIN
BART T. GARbutt
RICHARD T. GARRHEN
D. SHARON GENTRY

NANCY A. GRAHAM
STEPHEN E. HALE
WELVIN C. HALL
SHARON E. HAMM
ZACHERY R. HARGIS
CHRISTOPHER S. HERDUM
JERRI L. HILL
HOLLY M. HILLERMAN
ERIK S. HOUGHTON
ROBERT E. HOWARD
WM. CHEROBY JAMES
STEVEN JANKSZEWSKI
HELENN L. JONES
SARAH G. KERRY
SCOTT P. KRITLEY
CHRISTOPHER E. KOEPEL
TERRY D. KORDELISKI, II
C. DIANE LEE
JOSEPH P. LEHART
TYLER D. LEONARD
C. G. LEWIS, III
MARY JEAN LITTLE
LOUIE L. LOVONIEVES
JOHN D. LUTCH
BRENDAN J. MAGEE
JANET G. MALLOW
JOHN ROSS MALOY
MATT D. MATHESON

CLYDE L. MCCOY
RAYMOND A. MELTON
RICHARD A. MILDREN
QUSAIN MOHAMEDBHAI
J. LYON MOREHEAD
JAMIE E. MORROW
ROBERT A. NANCE
GARY L. NEAL
MARK L. NELMS
MARGARET A. NUPPERRY
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JAMES R. POLAN
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FRED RAHAL, JR.
LISA R. RIGGS
M. DAVID RIGGS
STEPHEN B. RILEY
RANDALL A. RINQUEST
MARY J. ROUNDS
GABRIELA N. SANCHEVAL
WILLIAM C. SEARCY
KRISTEN E. SHELINGTON
DAVID A. SHWERTAL
ROBERT P. SKEITH
KENNETH M. SMITH

SCOTT D. SMITH
BETTY J. SOMMARS
KIMBERLY V. SPARKS
BEVERLY A. STEWART
STEPHANIE L. THEBAN
DAVID H. THOMAS
HARLEY W. THOMAS
REX W. THOMPSON
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SONJA M. TREI
MICHAEL C. TURPEN
TRISHA VAN ARKEL-GREULICH
KARLEIGH WALSH
SHARON K. WEAVER
JOSEPH R. WELLS
BRIAN S. WILKINSON
DOUGLAS A. WILSON
JERRY L. WITT
COURTNEY M. WOLIN
MICHAEL P. WOLACK
GARY W. WOOD
TRACY S. ZAHLE

Of Counsel:
Banyan P. Abney
E. Bryan Hanson
Peter J. Regan

August 24, 2007

Theresa Noble Hill, Esq.
Rhodes Hieronymus
100 W. 5th Street
Suite 400
Tulsa, OK 74103

VIA ELECTRONIC MAIL

Re: Rule 30(b)(6) deposition notices directed to State of Oklahoma

Dear Theresa:

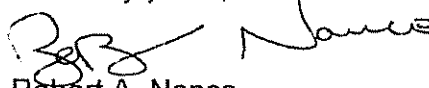
The State has received your August 17 Rule 30(b)(6) deposition notices and your letter of August 22 proposing a different schedule in light of Labor Day.

We want to inform you that, given the breadth and depth of these notices, and other depositions already noticed, the State will be unable to identify and prepare appropriate witnesses even by the schedule proposed in your letter of August 22. In addition, we are concerned that we will face a series of notices on similar topics by other defendants, and want to explore providing these depositions in a consolidated fashion to minimize the burden and expense to the State. We make this suggestion without waiver of any objection the State may have to your notices, their definitions, or the proposed topics to be addressed.

What are your thoughts about the means whereby we can cover these topics in a consolidated set of depositions, rather than by a series depositions conducted by different defendants? We need to broach this subject with all of the defendants. Are you willing to present it to the other defense counsel, or should we do so? Please let us know.

Thank you for your assistance in this regard.

Sincerely yours,


Robert A. Nance
For the Firm

Cc: Kelly Hunter Burch, Esq.
Trevor Hammons, Esq.